

**MEMO ENDORSED**

ROBERT CALIENDO, ESQ.

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June 2, 2020

**BY ECF**

Hon. William H. Pauley III, U.S.D.J.  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *U.S. v. Emmanuel Lambrakis*, 17 CR 208 (SDNY) (WHP)

Dear Judge Pauley:

Counsel respectfully seeks a consent bail modification, allowing the defendant's wife to travel to Pennsylvania this Sunday for medical treatment.

On Apr. 28, 2020, the Court bailed Lambrakis pending sentencing, with a condition that his "wife [] must remain in New York." ECF No. 117 at 3. She's a surety on the bond and has "moral suasion" over him. *Id.* at 2. Lambrakis is presently "subject to home incarceration" with an ankle bracelet and numerous restrictive conditions. *Id.* at 3.

The defendant's wife has cracked one of her molars, causing serious pain and other issues. She is friends with a dentist in Bensalem, Pennsylvania, who can promptly treat her. She would like to travel there this Sunday, June 7<sup>th</sup>, with plans to return to New York the same day. Their son will remain in New York with the defendant.

Counsel has provided the dentist's name and address to the government and U.S. Pretrial Services. Both the government and the defendant's supervising officer consent to the application.

Respectfully,

/S/

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cc: AUSA Ryan Finkel (by ECF and email)  
AUSA Sarah Mortazavi (by ECF and email)  
Southern District of New York  
One Saint Andrew's Plaza  
New York, NY 10007

Application granted.

SO ORDERED:



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WILLIAM H. PAULEY III  
U.S.D.J.

June 2, 2020